

May 10, 2005

Honorable James H. Welsh  
Commissioner of Conservation  
Department of Natural Resources  
Office of Conservation  
P. O. Box 94275  
Baton Rouge, Louisiana 70804-9275

RE: Homeseekers-Tweedel Zone, Reservoir A  
**HATHAWAY FIELD**  
Jefferson Davis Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of Victor P. Smith Oil Company, L.L.C., to the Commissioner of Conservation for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Homeseekers-Tweedel Zone, Reservoir A, in the Hathaway Field, Jefferson Davis Parish, Louisiana.

1. To establish rules and regulations governing the exploration for and production of gas and condensate from the Homeseekers-Tweedel Zone, Reservoir A, in the Hathaway Field, Jefferson Davis Parish, Louisiana.
2. To create a single drilling and production unit for this sand and to force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created.
3. To designate a unit operator and a unit well for the unit so created.
4. To provide that any well drilled outside of the Homeseekers-Tweedel Zone, Reservoir A, shall be in accordance with the spacing provisions of Statewide Order No. 29-E.
5. To provide that the Commissioner may reclassify the Reservoir by supplemental order and without the necessity of a public hearing should such reclassification be warranted, based on evidence furnished the Commissioner
6. To discuss any other matters that may be pertinent to this application.

The Homeseekers-Tweedel Zone in the Hathaway Field, Jefferson Davis Parish, Louisiana is hereby defined as that zone encountered between the measured depths of 9580' and 10630' in the Tee Oil Company - R.D. Bucklin No. 1 Well ( S.N. 188159), located in Section 4, Township 8 South, Range 3 West, Jefferson Davis Parish, Louisiana.

In addition to furnishing the legal notice to all Interested Parties, the applicant will provide for POSTING of the legal notice of the hearing and unit plat in a prominent place in the area of the Hathaway Field, Jefferson Davis Parish, Louisiana, and will cause the legal notice of the hearing to be PUBLISHED in a newspaper of general circulation published in the vicinity of the Hathaway Field, Jefferson Davis Parish, Louisiana, at least fifteen (15) days before the hearing date.

Any pertinent data relating to the subject application can be obtained **AT THE COST OF THE REQUESTING PARTY**, from David Comeaux at Leon E. Comeaux & Associates, 305 La Rue France, Lafayette, Louisiana 70508 (337-233-9839).

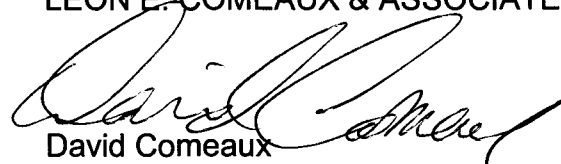
In compliance with the Rules of Procedure, a preapplication notice was given, but no request for a conference was received, and therefore, none was held.

There is attached hereto and made a part hereof a plat outlining the proposed unit and a list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom this application is being sent. Pursuant to the Revised Rules of Procedure, such list of parties and proposed unit plat (being the same plat attached to the April 27, 2005 preapplication notice) are being furnished **ONLY** to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, said plat and the list of parties will be provided to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, there is enclosed our check on behalf of the applicant, Victor P. Smith Oil Company, L.L.C., in the sum of \$755.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

LEON E. COMEAUX & ASSOCIATES



David Comeaux

DC/cu  
Enclosures

cc: Mr. Richard Hudson  
Office of Conservation  
825 Kaliste Saloom Road  
Brandywine III, Suite 220  
Lafayette, LA 70508

Interested Owners, Interested Parties  
and Represented Parties

W. H. Tupper

J. Tupper

R 3 W

Goach

Hamon 1  
9943'

T  
8  
S

G. White, et al

Daniel Oil  
Bucklin 1  
10004'

H. Bucklin

Smith Pet.  
Bucklin  
9970'

Stano  
Bucklin 1  
9951'

Fortune Gas & Oil, Inc.  
Bucklin 1  
9752'

Louise B. Connors, et al

Effie H. Bucklin, et al

Hilly-Wainoco  
Bruchhaus 2  
10200'

H. Bruchhaus, et ux

L. Irrigation & Mill

Owen 1  
10310'

HMSKRS-TW RA SUA  
(UNDRILLED)  
± 135 ACRES

Tee Oil 1  
10700'

Marshall Land Corp.

Diasu  
Marshall Land Corp. 1  
9770'

LIMCO

Ronald Taylor, et al

Barrier  
Perm.

Wainoco  
Bucklin 1  
10117'

HKW

Owen, et al 1 Un  
10615'  
9690'

M. Bucklin

H. Bruchhaus, et ux

Janice Matte, et vir

Margery Manuel, et al

Ray Allen Bucklin, et al

Ray Allen Bucklin, et al

EXHIBIT NO.

DOCKET NO.

VICTOR P. SMITH OIL COMPANY, L.L.C.

HATHAWAY FIELD  
JEFFERSON DAVIS PARISH, LOUISIANA

PROPOSED UNIT  
HOMESEEKERS-TWEEDEL ZONE

Geology by: David Comeaux

0 1000' 2000'

DATE:

LEON E. COMEAUX & ASSOC. GEOLOGISTS

Marshall Land Corp.

O'Connor-Faircloth  
Marshall 1  
10500'

Fault

David Chassion, et ux

Basin  
(Gulf)  
Smith 1  
10150'

GEOLOGICALLY SIGNIFICANT WELL

Int'l Nuclear  
G. Marshall  
10820'